

1 RODNEY S. DIGGS, Esq. (SBN 274459)
2 Email: RDiggs@imwlaw.com
3 IVIE McNEILL WYATT PURCELL & DIGGS
4 444 South Flower Street, Suite 3200
5 Los Angeles, California 90071
6 Telephone: (213) 489-0028
7 Facsimile: (213) 489-0552
8 Attorneys for Plaintiff, STEFFON BARBER

LAW OFFICES OF DALE K. GALIPO
Dale K. Galipo, Esq. (SBN 144074)
dalekgalipo@yahoo.com
Renee V. Masongsong, Esq. (SBN 281819)
rvalentine@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Tel: (818) 347-3333
Fax: (818) 347-4118

0 Attorneys for Plaintiff STEFFON BARBER

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

5 STEFFON BARBER, an individual,

6 Plaintiff,

VS.

9 COUNTY OF SAN BERNARDINO and
CHRISTOPHER ALFRED.

1 Defendants.

|CASE NO.: 5:22-cv-00625-KK-DTB

Assigned to:
Hon. District Judge Kenly Kiya Kato

**DECLARATION OF RENEE V.
MASONGSONG IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT;
EXHIBITS THERETO**

Date: November 13, 2025
Time: 9:30 a.m.
Crtrm: 3

[Memorandum of Points and Authorities in opposition to Defendants' motion for summary judgment; Separate Statement; Declaration of Scott DeFoe; Declaration of Robert Morales filed concurrently herewith]

DECLARATION OF RENEE V. MASONGSONG

I, Renee V. Masongsong, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the United States District Court for the Central District of California. I am one of the attorneys of record for Plaintiff Steffon Barber. I make this declaration in support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the relevant portions of the reporter's transcript of the Deposition of Defendant Christopher Alfred, as taken on August 26, 2025.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant portions of the reporter's transcript of the Deposition of Plaintiff Steffon Barber, as taken on September 9, 2025.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the verdict form in the case *Archibald v. County of San Bernardino*, case number 5-16-cv-1128.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the verdict form in the case *V.R. v. County of San Bernardino*, case number 5:19-cv-01023-JGB-SP.

I declare under penalty of perjury under that the foregoing that the foregoing is true and correct. Executed on this 23rd day of October, 2025.

/s/ *Renee V. Masongsong*

Renee V. Masongsong